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8 *Attorneys for Defendants Americare, Inc.*
Mario Gonzalez and Jennifer Gonzalez

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ELEVATION HEALTH, LLC, a foreign limited
liability company,

13 Plaintiff,

14 vs.

15 AMERICARE, INC., a domestic corporation;
16 MARIO GONZALEZ, individually; JENNIFER
17 GONZALEZ, individually; DOES I through X;
18 and ROE CORPORATIONS I through X,

19 Defendants.

20 CASE NO.: 2:22-cv-01590-GMN-NJK

21
22 **STIPULATION AND PROPOSED
ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

23 Plaintiff Elevation Health LLC (“Plaintiff”) and Defendants Americare, Inc., Mario
Gonzalez and Jennifer Gonzalez (collectively “Defendants,”) and collectively with Plaintiff, the
“Stipulating Parties”), by and through their respective counsel, hereby stipulate as follows:

24 WHEREAS, Plaintiff filed its Complaint on September 21, 2022;

25 WHEREAS, Defendants Mario Gonzalez and Jennifer Gonzalez were served on
26 October 4, 2022 with their response due on October 25, 2022 (Dkts. 5-6);

27 WHEREAS, Defendant Americare, Inc. was served on October 13, 2022 with its
28 response due on November 3, 2022 (Dkt. 7);

1 WHEREAS, Defendants have recently retained counsel;

2 WHEREAS, the Stipulating Parties agree that good cause exists to extend the time for
3 Defendants to answer, move, or otherwise respond to the Complaint to November 21, 2022;

4 WHEREAS, the Stipulating Parties have not previously requested or agreed to any
5 extension of time for Defendants to respond to the Complaint; and

6 WHEREAS, this change will not alter the date of any event or any deadline already
7 fixed by Court order.

8 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Stipulating
9 Parties, through their respective counsel, that the time for Defendants to answer, move, or
10 otherwise respond to the Complaint shall be extended to November 21, 2022.

11 **IT IS SO STIPULATED.**

12 DATED this 8th day of November, 2022.

13 COHAN PLLC

14 /s/ *Chasen Cohan*

15 Chasen Cohan (12349)
16 6718 W. Sunset Rd., Suite 150
17 Las Vegas, NV 89118

18 Attorneys for Elevation Health

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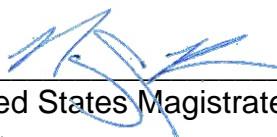
/s/ *Todd W. Prall*

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20 *Attorneys for America, Inc, Mario Gonzalez
and Jennifer Gonzalez*

21 **IT IS SO ORDERED.**

22 Dated: November 9, 2022

23
24 
25 United States Magistrate Judge